

UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE NASHVILLE

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| IAN HUNTER LUCAS, <i>pro se</i> | : | 3:24-cv-00440 |
| | | <i>Plaintiff(s),</i> |
| | : | |
| | | v. |
| | : | Judge Waverly D. Crenshaw, Jr |
| | | Magistrate Judge Jeffery S. Frenzley |
| MARY ANN JESSEE et al., | : | |
| | | <i>Defendant(s).</i> |
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**PLAINTIFF'S MOTION TO TRANSFER CASE TO THE WESTERN OR EASTERN
DISTRICT UNDER 28 U.S.C. §§ 1404 AND 1406**

Pursuant to 28 U.S.C. §§ 1404 and 1406, Plaintiff Ian Hunter Lucas, *pro se*, respectfully moves to transfer this case to the United States District Court for the Western District of Tennessee or the Eastern District of Tennessee. The grounds for this motion are based on the fact that all district judges and magistrate judges in the Middle District of Tennessee are graduates of Vanderbilt University and/or have had significant roles or tenures at Vanderbilt University, thus creating a potential bias against the Plaintiff. In support, Plaintiff submitted his Memorandum of Law dated May 30, 2024, which is being filed contemporaneously with this motion, along with the accompanying Declaration of Ian Hunter Lucas.

PLEASE TAKE NOTICE that Plaintiff Ian Hunter Lucas will move this Court pursuant to the aforementioned statutes and rules, before the Honorable Waverly D. Crenshaw, Jr., United States District Court for the Middle District of Tennessee, at the United States District Courthouse, Nashville, Tennessee, on a date and time to be determined by the Court, for an Order granting Plaintiff's motion to transfer this case to the Western District of Tennessee or the Eastern District of Tennessee, and for other and further relief as the Court deems just and proper.

Dated this 30th day of May 2024.

Ian Hunter

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PROOF OF SERVICE

I hereby certify that a true and correct copy of the foregoing Plaintiff's Motion for Leave to File an Amended Complaint and any accompanying documents were served by Court's CM/ECF system, which automatically forwarded a copy to the following counsel of record

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Respectfully,

/s/ Ian Hunter Lucas

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